

EXHIBIT A

From: [Andrew D. Freeman](#)
To: [Ava E. Lias-Booker \(alias-booker@mcguirewoods.com\)](#)
Cc: [Martinez, Melissa O.](#); [Barber, Kathryn M.](#); [James R. Benjamin Jr.](#); [zzz.External.jeon@aclu-md.org](#); [Freedman, John A.](#); [Colley, Mark D.](#); [Mazzullo, Michael](#); [Racheva, Youlia](#); [Tierney Peprah](#)
Subject: RE: Baltimore County redistricting
Date: Tuesday, March 8, 2022 12:10:24 PM

External E-mail

Ava:

In our phone conversation yesterday evening, I understood you and Melissa to say that you would provide Plaintiffs this morning with the County's portion of a joint status report "setting forth [the parties'] respective views on how this matter should proceed." It's now past noon, and we have not received it. Because Plaintiffs believe the Court should schedule a pre-hearing conference at its earliest convenience (preferably later this week) to discuss how this matter should proceed, and because we see no reason to delay filing the joint status report, please send us the County's portion as soon as possible. If we do not receive anything from the County by 2 p.m., Plaintiffs plan to file a status report that indicates that we have not received the County's portion.

Also in our conversation and in my email last night, I again requested that the County produce its new proposed map, including the shapefiles and an Excel spreadsheet of the precincts and their districts under that proposal. We do not see any reason that the County has not shared that information, other than as a tactic to delay these proceedings by delaying Plaintiffs' ability to analyze the new proposal. In our phone conversation, Melissa requested (for the first time) the shapefiles for Plaintiffs' proposed plans 1 and 5, and I sent those to you within a few hours of that request. Once again, Plaintiffs request that the County produce its new map, shapefiles, and precinct spreadsheet immediately.

Thanks.

Andy

From: Andrew D. Freeman
Sent: Monday, March 7, 2022 8:46 PM
To: Ava E. Lias-Booker (alias-booker@mcguirewoods.com) <alias-booker@mcguirewoods.com>
Cc: Martinez, Melissa O. <MMartinez@mcguirewoods.com>; Barber, Kathryn M. <KBarber@mcguirewoods.com>; James R. Benjamin Jr. <jrbenjamin@baltimorecountymd.gov>; Debbie A. Jeon (jeon@aclu-md.org) <jeon@aclu-md.org>; John A. Freedman - Arnold & Porter Kaye Scholer LLP (john.freedman@arnoldporter.com) <john.freedman@arnoldporter.com>; Colley, Mark D. <mark.colley@arnoldporter.com>; Michael Mazzullo (Michael.Mazzullo@arnoldporter.com) <michael.mazzullo@arnoldporter.com>; Youlia.Racheva@arnoldporter.com; Tierney Peprah <tpeprah@aclu-md.org>
Subject: RE: Baltimore County redistricting

Ava:

While I appreciate your calling me back at 5:30 this evening in response to my previous calls, texts, and email, Plaintiffs do not understand why, despite our requests, Baltimore County will not share with them the precinct list or shapefiles of the new map that the Council has apparently already decided upon until the Council submits it to the court tomorrow. Given that it is in everyone's interest to move this process along expeditiously, and given that Plaintiffs cannot analyze whether the new map complies with the court's order that the new map add "an additional County District in which Black voters otherwise have an opportunity to elect a representative of their choice and that comports with the requirements of the Voting Rights Act, 52 U.S.C. § 10301," without that data, the County should have already provided that information. It is highly unlikely that the County Council can comply with the court's order by drawing a new map with a second district that is not majority Black and for which it has not had an expert conduct a performance analysis.

Once again, Plaintiffs request that the County provide them, immediately, with (1) an Excel spreadsheet of the precincts under the Council's new proposed map, with two columns – the first a complete precinct list and the second the district number for each precinct, and (2) the shapefiles of the new proposed map.

In our call, Melissa asked that Plaintiffs provide the County with the shapefiles for our proposed plans 1 and 5. I note that the County has had Plaintiffs' Maps 1 and 5 for months, but this is the first time the County has requested that data. I have reached out to our expert to request those files and will forward them as soon as I receive them.

I also look forward to receiving the County's draft of a proposed status report as early as possible tomorrow morning.

Andy

From: Andrew D. Freeman

Sent: Saturday, March 5, 2022 8:49 AM

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Subject: Baltimore County redistricting

Ava:

I'm sorry you weren't able to call me back yesterday. I was and am hoping to speak with you

regarding the status of the County's compliance with Judge Griggsby's order. As you and I discussed previously, Plaintiffs are willing to make their experts available to assist the council in its map drawing and to carry out performance analyses to be sure that any new map complies with the judge's order directing "the County to adopt a redistricting map that either includes two reasonably compact majority-Black Districts for the election of County councilmembers, or an additional County District in which Black voters otherwise have an opportunity to elect a representative of their choice and that comports with the requirements of the Voting Rights Act, 52 U.S.C. § 10301" on or before Tuesday, March 8. The court also directed the parties to file a joint status report on March 8. While we have asked our experts to be available, we can't wait till the last minute. And Plaintiffs cannot agree to a new map unless it creates a second district that will perform for Black voters. When can we expect to receive a draft of the map or maps that the council is considering?

I am available to talk today at your convenience. Please call me on my cellphone, 410-404-4888, or let me know when would be a convenient time to call you.

Thanks.

Andy

Andrew D. Freeman

Attorney

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